

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**OUTMEMPHIS; MICHELLE  
ANDERSON; JANE DOE 2;  
JANE DOE 3; and JANE DOE 4,**

**Plaintiffs,**

**v.**

**BILL LEE, in his official capacity as  
Governor of Tennessee; JONATHAN  
SKRMETTI, in his official capacity as  
Attorney General and Reporter of  
Tennessee; DAVID RAUSCH, in his  
official capacity as Director of the  
Tennessee Bureau of Investigation;  
and FRANK STRADA, in his official  
capacity as Commissioner of the  
Tennessee Department of Correction,**

**Defendants.**

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**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**STATE OF TENNESSEE, and  
TENNESSEE BUREAU OF  
INVESTIGATION,**

**Defendants.**

**Case Nos.     2:23-cv-2670  
                    2:24-cv-02101**

**Chief Judge Lipman**

**PLAINTIFF UNITED STATES' UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
RESPOND TO THE MOTION TO DISMISS AND FOR LEAVE TO FILE EXCESS PAGES**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 12.1(b), the United States moves for a 14-day extension of time in which to respond to Defendants State of Tennessee and Tennessee Bureau of Investigation's Motion to Dismiss the United States' Complaint (ECF No. 28).

The current deadline to respond is May 8, 2024. The United States requests up to and including May 22, 2024, to respond to Defendants' motion. The United States also moves pursuant to Local Rules 12.1(b) and 7.2(e) for a five-page enlargement of the page limits applicable to briefing on the Response to Defendants' motion.

An extension of time to respond and an enlargement of pages to a total of 25 pages will permit the United States to fully address the arguments Defendants raise in their memorandum in support of their motion. Defendants' memorandum raises issues of statutory interpretation and jurisdiction that have significant implications for the United States' ability to enforce Title II of the Americans with Disabilities Act. Allowing the United States the opportunity to fully brief the issues at this stage will result in more efficient processing of the litigation.

The undersigned has conferred with counsel for Defendants, who do not oppose the 14-day extension up to and including May 22, 2024, or the five-page enlargement to 25 pages.

Respectfully submitted,

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### CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2024, a true and exact copy of the foregoing was served via the court's electronic filing system upon counsel as follows:

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